

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

CENTRAL ILLINOIS LIGHT COMPANY)	
D/B/A Ameren/CILCO)	
)	No. 05-0160
Proposal to implement a competitive procurement)	
Process by establishing Rider BGS, Rider BGS-L,)	
Rider RTP, Rider RTP-L, Rider D, and Rider MV)	
)	
CENTRAL ILLIONOIS PUBLIC SERVICE COMPANY)	
d/b/a AmerenCIPS)	
)	No. 05-0161
Proposal to implement a competitive procurement)	
Process by establishing Rider BGS, Rider BGS-L,)	
Rider RTP, Rider RTP-L, Rider D, and Rider MV)	
)	
ILLINOIS POWER COMPANY)	
d/b/a AmerenIP)	
)	No. 05-0162
Proposal to implement a competitive procurement)	
Process by establishing Rider BGS, Rider BGS-L,)	
Rider RTP, Rider RTP-L, Rider D, and Rider MV)	

**MOTION OF THE PEOPLE OF THE STATE OF ILLINOIS
FOR LEAVE TO FILE A LATE-FILED EXHIBIT**

NOW COME the People of the State of Illinois, by Lisa Madigan, Attorney General (“AG” or “the People”), and pursuant to Section 200.190 of the Rules of Practice of the Illinois Commerce Commission (“ICC” or “Commission”), hereby respectfully request leave to file a late-filed exhibit in the above-captioned proceeding. 83

Ill.Admin.Code §290.190. In support of their Motion, the People state as follows:

1. On June 15, 2005, the People submitted the pre-filed direct testimony of Dr. Kenneth Rose. Attached to that testimony was AG Exhibit 1.2, a review and analysis co-authored by Dr. Rose and presented to the Virginia State Corporation Commission on August 25, 2004, entitled “2004 Performance Review of Electric Power Markets, Update

and Perspective” (“2004 Performance Review”). The 2004 Performance Review was conducted on behalf of the Corporation Commission and presented to the Virginia General Assembly as part of that agency’s annual report to the legislature on the advancement of a competitive retail electricity market in the Commonwealth of Virginia. The 2004 Performance Review included an analysis of the state of electric deregulation and energy prices in the 50 states, based on data available to Dr. Rose in 2004.

. 2. On September 6, 2005, Dr. Rose provided to counsel for the People his “2005 Performance Review of Electric Power Markets, Update and Perspective”, the current version of his annual Performance Review (“2005 Performance Review”). The 2005 Performance Review presents Dr. Rose’s most recent assessment of the state of electric deregulation and energy prices nationwide, and updates information contained in AG Exhibit 1.2, based on the most current information available to Dr. Rose. The 2005 report is attached to this Motion as AG Exhibit 1.4.

3. The information contained in AG Exhibit 1.4 is critical to the Commission’s determination in this docket, as it contains updated information, including energy price information, which is central to the key issues in this case.

WHEREFORE, for all of the foregoing reasons, the People respectfully request that the ALJ grant this Motion for Leave to File a Late-Filed Exhibit and accept the attached AG Exhibit 1.4 as a late-filed exhibit.

Respectfully submitted,
THE PEOPLE OF THE STATE OF ILLINOIS
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Dated: September 7, 2005